

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
: 08 CR. 0087 (VM)
:
- against - : **ORDER**
:
:
JIN YUN GAO et al., :
:
Defendants. :
-----X

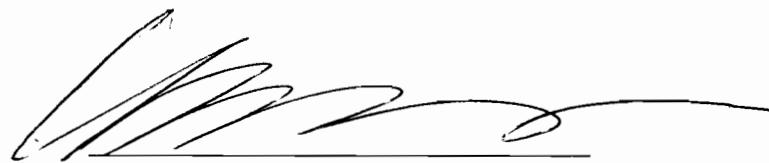
VICTOR MARRERO, United States District Judge.

The Government (see attached letter) requests an adjournment of the conference that was scheduled for June 27, 2008. The next conference in this matter is scheduled for July 25, 2008 at 9:30 a.m. The Government also requests exclusion of time from the Speedy Trial Act calculations until July 25, 2008. All parties to this action consent to an exclusion of the adjourned time from the Speedy Trial Act until July 25, 2008.

It is hereby ordered that the adjourned time shall be excluded from speedy trial calculations. This exclusion is designed to guarantee effectiveness of counsel and prevent any possible miscarriage of justice. The value of this exclusion outweighs the best interests of the defendants and the public to a speedy trial. This order of exclusion of time is made pursuant to 18 U.S.C. §§ 3161(h)(8)(B)(ii) & (iv).

SO ORDERED:

Dated: New York, New York
26 June 2008



Victor Marrero
U.S.D.J.



*United States Attorney
Southern District of New York*

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June 26, 2008

BY FAX

The Honorable Victor Marrero
United States District Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

Re: United States v. Jin Yun Gao, Mei Fang Zhang, and Qiang Yu,
08 Cr. 087 (VM)

Dear Judge Marrero:

I write to respectfully inform the Court that two of the above-named defendants intend to plead guilty to the above-referenced Information tomorrow in Magistrate's Court pursuant to your referral. With respect to the remaining defendant, Mei Fang Zhang, the Government and defense counsel for defendant Zhang jointly respectfully request that the conference in the above matter previously scheduled for June 27, 2008 at 2:45 p.m. be rescheduled to July 21, 2008 to permit the parties to continue plea discussions.

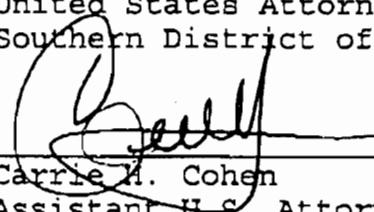
The Government respectfully requests that the Court exclude time from the date of this letter until July 21, 2008, pursuant to the Speedy Trial Act, Title 18, United States Code, Section 3161(h)(8)(A). The ends of justice served by such continuance outweigh the interest of the public and the defendant in a speedy trial because the continuance will allow the Government time to collect and produce discovery to the defendant and the defense to

review that discovery. Counsel for all of the defendants consent to this request.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney
Southern District of New York

By:


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cc by fax: David Wikstrom, Esq., Attorney for Defendant Gao
Bennett Epstein, Esq., Attorney for Defendant Zhang
Joel Cohen, Esq., Attorney for Defendant Yu